

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

Atlas Data Privacy Corporation, et al.

Plaintiff(s),

v.

DarkOwl, LLC, et al.

Defendant(s).

Civil No. 24-cv-010600

DISCLOSURE STATEMENT¹ PURSUANT TO FED. R. CIV. P. 7.1(a)(2)

DarkOwl, LLC

<input type="checkbox"/>	Individual ²
<input type="checkbox"/>	Corporation ³
<input type="checkbox"/>	Partnership ⁴
<input checked="" type="checkbox"/>	Limited Liability Company ⁵
<input type="checkbox"/>	Other

State(s) of Citizenship

See attached

<input type="checkbox"/>	Individual
<input type="checkbox"/>	Corporation
<input type="checkbox"/>	Partnership
<input type="checkbox"/>	Limited Liability Company
<input type="checkbox"/>	Other

State(s) of Citizenship

<input type="checkbox"/>	Individual
<input type="checkbox"/>	Corporation
<input type="checkbox"/>	Partnership
<input type="checkbox"/>	Limited Liability Company
<input type="checkbox"/>	Other

State(s) of Citizenship

In cases where one or more parties are partnerships or LLCs, list all partners or members and their citizenship. This space should also be used where there are more than three parties. Additional sheets may be added as needed.

See attached. DarkOwl, LLC is a citizen of Colorado, California, Pennsylvania, New York, Florida, Missouri, Wyoming, Georgia, Virginia, Utah, Texas, Montana, Maryland, Oregon, Tennessee, Arizona, North Carolina, and Washington, DC.

Pursuant to 28 U.S.C. § 1746 and Fed. R. Civ. P. 11, I certify that the foregoing is true and correct.

Kelly Purcaro

Date:

November 20, 2024

¹ This statement shall be filed by each party.

² 28 U.S.C. § 1332(a)(1); *McNair v. Synapse Grp. Inc.*, 672 F.3d 213, 219 n.4 (3d Cir. 2012) (citing *Krasnov v. Dinan*, 465 F.2d 1298, 1300 (3d Cir. 1972) (“[M]ere residency in a state is insufficient for purposes of diversity [of citizenship].”)). The natural person must be domiciled in the state and a citizen of that state. *See Gilbert v. David*, 235 U.S. 561 (1915); *Lincoln Ben. Life Co. v. AEI Life, LLC*, 800 F.3d 99 (3d Cir. 2015).

³ 28 U.S.C. § 1332(c)(1) (“[A] corporation shall be deemed to be a citizen of every State and foreign state by which it has been incorporated and of the State or foreign state where it has its principal place of business . . .”); *Hertz Corp. v. Friend*, 559 U.S. 77 (2010); *S. Freedman & Co., v. Raab*, 180 F. App’x 316, 320 (3d Cir. 2006) (explaining that “[i]n order to adequately establish diversity jurisdiction, a complaint must set forth with specificity a corporate party’s state of incorporation and its principal place of business,” and affirming dismissal of complaint alleging that corporation maintained “a principal place of business,” rather than “its principal place of business” (quoting *Joiner v. Diamond M Drilling Co.*, 677 F.2d 1035, 1039 (5th Cir. 1982))). The parties are directed to list the state of incorporation and principal place of business of the corporation.

⁴ A partnership, as an unincorporated entity, takes on the citizenship of each of its partners. *Zambelli Fireworks MFG. Co. v. Wood*, 592 F.3d 412, 419 (3d Cir. 2010) (citation omitted). The parties are directed to list each partner and its citizenship.

⁵ The citizenship of an LLC is determined by the citizenship of each of its members. *See Carden v. Arkoma Assocs.*, 494 U.S. 185 (1990); *Lincoln Ben. Life Co. v. AEI Life, LLC*, 800 F.3d 99, 105 (3d Cir. 2015). The parties are directed to list each member and its citizenship. If any member is itself a partnership, limited liability company, or other unincorporated association, its partners or members and their citizenship must be set forth separately. *See Zambelli Fireworks MFG. Co. v. Wood*, 592 F.3d 412, 420 (3d Cir. 2010) (“And as with partnerships, where an LLC has, as one of its members, another LLC, the citizenship of unincorporated associations must be traced through however many layers of partners or members there may be to determine the citizenship of the LLC.”)

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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY
CORPORATION, as assignee of individuals
who are *Covered Persons*, PATRICK
COLLIGAN, and
PETER ANDREYEV,

Plaintiffs,

v.

DARKOWL, LLC, RICHARD ROES 1-10,
fictitious names of unknown individuals and
ABC COMPANIES 1-10, *fictitious names of*
unknown entities,

Defendants.

Case No.: 24-cv-10600

Civil Action

**ADDENDUM TO
DISCLOSURE STATEMENT
PURSUANT TO FED. R. CIV.
P. 7.1(a)(2)**

Defendant DarkOwl, LLC's members are as follows:¹

Member	Sub-Member (As Applicable)	State(s) of Citizenship
The Mark Timothy Turnage Revocable Declaration of Trust dated July 11, 1996, as amended	Mark Timothy Turnage	Colorado
Trilby Holdings Inc.	N/A	Colorado
Lawrence A. Bowman Revocable Trust	Larry Bowman	California
Matthew Kiley	N/A	Pennsylvania
Eric Rosen	N/A	New York
Walter G Borst Living Trust	Walter Borst	Florida
Jeffrey A. Rosenblum Revocable Trust dtd 6/30/90	Jeff Rosenblum	Missouri
Futaleufu Partners, LLC	David Dodson	Wyoming
	Susan Pohlmeyer	California
	Jason Jackson	Georgia
David Trautenberg	N/A	Colorado
The Boenig/Afane Family Trust	Will Boenig	California
John Measner	N/A	Colorado
Ari Spar	N/A	New York
William F. and Katherine B. Duhamel	N/A	California
Dave Hanson	N/A	Colorado
Red Dog III, LLC	James Berger	Colorado
	David Berger	Georgia
James Zachry Turner		Colorado
Kechriots LLC	John Kechriots	Colorado
Constantine Kechriots	N/A	Florida
Christian Kechriots	N/A	Florida
Mike Franson	N/A	Colorado
Wesley A. Brown	N/A	Colorado
Katherine Gold	N/A	Colorado
The Spar Family Revocable Trust	Elon Spar	California

¹ Where DarkOwl lacks direct knowledge, states of citizenship are pled on information and belief based upon due diligence completed regarding same.

Member	Sub-Member (As Applicable)	State(s) of Citizenship
John Bocock	N/A	Virginia
Alexander Bocock	N/A	Utah
David Asseoff	N/A	Colorado
Billy Greenblatt	N/A	New York
The Brandon T. Greenblatt 2015 Trust	Mark Jennings	Texas
The Steven J. Greenblatt 2015 Trust	Mark Jennings	Texas
The Maggie S. Greenblatt 2015 Trust	Mark Jennings	Texas
OWL Employee Holdings, LLC	Employees of OWL Employee Holdings, LLC	Colorado, California, Montana, Maryland, Florida, Oregon, Pennsylvania, New York, Tennessee, Washington, Arizona, Texas, and North Carolina
Bartlett Family Revocable Trust DTS 1/30/01	Paul Bartlett and Elizabeth Bartlett	California
Charles Wu and Anne Wu Trust	Charles and Anne Wu	California
Maritz Family Partners LP	Philip Maritz	Missouri
Rabbi Adam Kligfeld	N/A	California
Jonas Wadler	N/A	California
Jonathan Dorff	N/A	Pennsylvania
Five Elms IV A, LP	Federick Coulson, IV	Arizona
	Thomas Kershisnik	Missouri
	Stephanie Schneider	Missouri
	Joe Onofrio	Missouri
	Ryan Mandel	Missouri
DO FE Splitter, LP	Federick Coulson, IV	Arizona
	Thomas Kershisnik	Missouri
	Stephanie Schneider	Missouri

Member	Sub-Member (As Applicable)	State(s) of Citizenship
	Joe Onofrio	Missouri
	Ryan Mandel	Missouri
Five Elms IV Q, LP	Federick Coulson, IV	Arizona
	Thomas Kershisnik	Missouri
	Stephanie Schneider	Missouri
	Joe Onofrio	Missouri
	Ryan Mandel	Missouri
In-Q-Tel	Michael M. Crow	Arizona
	Peter Barris	Maryland
	Safra A. Catz	Florida
	Howard Cox	California
	Admiral Mike Mullen	Maryland
	Stephanie O'Sullivan	Virginia
	Ben Sasse	Washington, DC
	Ted Schlein	California
	Jeffrey H. Smith	Washington, DC
	George Tenet	Maryland